



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
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NEW YORK, NY 10007-1866

APR 17 2014

Colonel Paul E. Owen
District Engineer
U.S. Army Corps of Engineers
26 Federal Plaza
New York, New York 10278

Dear Colonel Owen:

This letter is in response to the Fire Island Inlet to Moriches Inlet (FIMI), Fire Island Stabilization Project, Draft Environmental Assessment (DEA), dated March 2014. The project consists of the placement of sand on the ocean side of Fire Island. The plan includes the development of a berm and dune of varying magnitudes in areas that are deemed as having the greatest potential for damages to oceanfront structures. The selected alignment requires a total of approximately 41 real estate acquisitions and 7 real estate relocations (6 structures and relocation/reconstruction of the Ocean Beach well complex).

Alternatives Analysis

There are two alternatives evaluated in the DEA, the No Action Alternative and the Selected Alternative. However, there are a variety of different fill placement options which span from less invasive to more invasive and in doing so, paint a more holistic view of the ways in which the project can be approached. For example, beach fill could be placed in areas with built infrastructure such as homes, businesses and recreational facilities, but areas such as the undeveloped sections of Smith County Park, do not warrant federal intervention.

Another possible alternative could evaluate the cost and impact of raising the structures that are in need of protection. Roads, homes, and buildings could be elevated, moved inland, or acquired and demolished. This would eliminate or greatly reduce the need for stop gap measures such as beach fill and allow the natural processes of the island to occur with a lower level of risk. Though this option may not be feasible in its entirety due to cost, it would demonstrate another approach for comparison purposes and may also provide a road map for future protective measures that can be considered once the area is temporarily stabilized by the addition of beach fill.

EPA believes that by presenting only two alternatives, the document fails to present a comprehensive assessment of the possible approaches to stabilizing the island, and the possible range of impacts. Additionally, the No Action Alternative fails to fully evaluate the positive effects of the No Action Alternative on fish and wildlife resources, instead focusing disproportionately on the negative impacts. Though the project is aimed at stabilizing the island and its residential structures, maintaining and protecting the fish and wildlife population is also essential to recreational value of the area. People are drawn to the island to pursue a variety of outdoor recreational activities (hiking, fishing, bird watching, etc.), and the fish and wildlife of the area are an asset to that experience and warrant protection as well. The final EA should present a more accurate depiction of the positive impacts that the ecosystem has experienced as a result of the breaches. Special emphasis should be given in this discussion to the notable post-Sandy piping plovers habitat in the area, especially in light of the diminishing availability of suitable habitat.

The last line of the first paragraph under section 4.1 No Action Alternative states, "Since the No Action alternative does not meet the needs of the communities, it is not the socially preferred alternative." This sentence implies that the selected alternative was chosen based on social demand. We believe it is the responsibility of the federal government to find a solution that balances the needs of the community with the needs of the environment, and to come up with a balanced solution. Excessive focus on meeting social demands could also unintentionally encourage additional development in areas that will be increasingly difficult to secure in the future. The two alternatives presented in the DEA do not demonstrate a sufficient balance between the social and environmental concerns necessary to ensure the long-term sustainability and resiliency of the barrier island.

EPA believes a revised selected alternative is necessary, which limits fill activities to the most sensitive areas, and increases the portion of the island which is allowed to migrate and follow the natural littoral process of a barrier island in locations such as the undeveloped section of Smith County Park.

Selected Alternative

The DEA indicates that the placement of beach fill will significantly reduce flood risks from major storms. The Final EA needs to clarify that flood risks to homes on the south shore of Long Island that were affected by flooding from the inlets will not be protected by beach fill. To clarify this point, the Final EA needs to specify what portion or percentage of flooding and damage during Sandy was attributable to flooding from the inlets and what was attributable to the breaching and overwashing of dunes. Conversely, the Final EA should indicate the level of protection that can be expected as a result of this project in the face of another super storm of the same magnitude. EPA believes this is a critical distinction that needs to be clarified in the Final EA so that the public has clear expectations of what protection the project will provide.

The value in using beach fill is to protect the infrastructure of the island. However, as stated on Page 14 of the DEA, this project is designed as a one-time stand-alone effort. Page 22 states, "USACE expects that effects of the proposed action will provide storm damage protection for five years and then erode over the next five years to a point where the newly created dune would not provide protection." Given the short time frame of protection offered by the project, and the fact the natural littoral process of the island will likely only intensify as a result of sea level rise and climate change, the Final EA needs to include a detailed discussion of other federal projects including the raising of roads and houses on the mainland. There should also be an enhanced discussion of the proposed projects mentioned on page 13, which include "elevation, relocation, flood proofing, buyout, etc" as these projects would strengthen the resiliency of the developed parts of the island more than just beach fill alone.

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Additional clarification is necessary in regards to how this project relates to the larger Fire Island to Montauk Point – Tentatively Federally Supported Plan (FIMP-TFSP). The scope of the FIMI appears to overlap significantly with the FIMP. The Final EA should clearly bridge the two efforts to demonstrate a cohesive and unified effort to enhance the long term resiliency of the island.

Due to the scope of the project, complexity of addressing barrier island and coastal geomorphology, the significant amount of essential habitat for fish and wildlife that will be affected, the impact on threatened and endangered species, and the need to consider the future sustainability and resiliency of the island, EPA believes that an Environmental Impact Statement is more appropriate to adequately evaluate the impacts of the Fire Island Inlet to Moriches Inlet Fire Island Stabilization Project. We do not believe that the DEA sufficiently communicates the potential environmental impacts of the proposed project and what level of protection can be expected from the project.

Thank you for the opportunity to comment. Should you have any questions concerning this letter please feel free to contact Stephanie Lamster of my staff at 212-637-3465.

Sincerely,



Grace Musumeci, Chief
Environmental Review Section